



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 1, 2022

BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

Re: *United States v. Williams, et al.* 21 Cr. 603 (VEC)

Dear Judge Caproni:

The Government writes pursuant to the Court's order dated November 1, 2021, to provide an update on the status of discovery in the above-captioned case.

Following the entry of the protective order on December 2, 2021, the Government produced Rule 16 materials to the defendants, via the court appointed discovery coordinator, on December 8, 2021, December 15, 2021 and December 20, 2021. In total, the Government has produced approximately 4,000 individual files which total more than 230,000 pages of documents. The Government's productions have included the following categories of materials, among others: (i) search warrants and accompanying affidavits; (ii) emails identified by the FBI to be responsive to certain search warrants; (iii) § 2703(d) orders and applications; (iv) § 2703(d) returns; (v) pen register returns; (vi) subpoena returns obtained from numerous sources, including but not limited to financial institutions; phone companies; email service providers; online payment companies; credit card companies; social media; airlines; car services; and third party administrators of health benefits.

The Government is staging a fourth production, which contains at least approximately 575 additional files, at least approximately 168,000 pages of documents, and primarily consists of subpoena returns. The Government anticipates producing this fourth production in approximately one week. After the fourth production is made, the outstanding Rule 16 materials that will need to be produced include: materials identified as responsive to search warrants on electronic devices seized on the day of the arrests in this case, which are subject to ongoing review; additional documents identified as responsive to email search warrants, which are also subject to ongoing review; and additional materials obtained via subpoenas. The Government notes, however, that its investigation remains ongoing and that, as a result, the Government anticipates acquiring additional material some of which will require disclosure.

The Government has also made individual productions to each of the 19 defendants, although as to one defendant a technical issue has delayed production of certain files. The Government hopes to resolve that issue soon. Individual productions generally contain

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information about the defendant's criminal history, and recordings or notes of their post-arrest interview, if any.

Finally, the Government notes that it appreciates the work of Ms. Greenwood and her staff in facilitating and coordinating discovery in this matter. Ms. Greenwood's efforts have allowed the discovery process to function in a more efficient manner.

* * *

The Government is available to address any questions the Court may have.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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